

**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT  
MARSHALL COUNTY, ILLINOIS**

JACKIE RHODES,

Plaintiff,

-vs-

JOSEPH A. CONNOR, SCOTT A. LINS,  
ROBERT R. RADDENBACH and  
HAVLOR LINES, INC.,

Defendants.

Case No. 2022 LA 3

**SUBPOENA DUCES TECUM FOR DISCOVERY DEPOSITION (RECORDS ONLY)**

To: United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

YOU ARE COMMANDED to appear and to bring the following records before a Notary  
Public at Tracy, Johnson & Wilson, 2801 Black Road, Second Floor, Joliet, Illinois 60435, on  
September 2, 2022 at 3:00 p.m.:

See attached "Exhibit A" for documents being requested.

***\*\*PLEASE NOTE THAT YOUR APPEARANCE WILL BE EXCUSED IF THE SPECIFIED  
DOCUMENTS ARE PRODUCED BY THE ABOVE DATE AND TIME.***

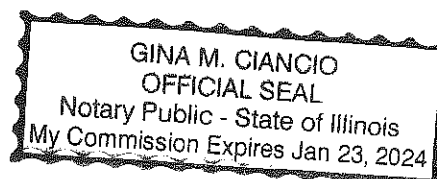
JACKIE RHODES, Plaintiff

By:

*Gaming S. Warden*  
One of Her Attorneys

Signed and Sworn to before me  
this 12<sup>th</sup> day of Aug, 2022.

*Gina M. Ciancio*  
Notary Public



**PROOF OF SERVICE**

I served the subpoena on United States Environmental Protection Agency on 8/12/22, 2022 via Federal Express Standard Overnight Delivery. I paid the witness \$20 for witness and/or copying fees.

Tammy S. Warden

Signed and sworn to before me  
this 12<sup>th</sup> day of Aug, 2022.

Gina M. Ciancio  
(Notary Public)



Tammy S. Warden - 06256831  
Tracy, Johnson & Wilson  
2801 Black Road, Second Floor  
Joliet, Illinois 60435  
(815) 723-8500  
twarden@tracylawfirm.com

# **EXHIBIT A**

## ***RIDER***

All documents related to any permission given to any person or entity allowing that person or entity to start any sort of grass/brush fire near Interstate 39 in Marshall County, Illinois at approximately mile marker 40 from January 1, 2021 to March 15, 2021, including but limited to any permits issued by the US EPA, as well as any grass/brush fires that were performed on March 13, 2021 pursuant to some form of open burn program.